

Hon. Paul A. Engelmayer
United States District Court
for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

November 22, 2024

Re: Jane Street Grp., LLC v. Millennium Mgmt. LLC et al., No. 1:24-cv-02783

Dear Judge Engelmayer:

We write on behalf of Defendants Douglas Schadewald, Daniel Spottiswood, and Millennium. Pursuant to Local Civil Rule 7.1(d) and Individual Practice Rule 4.B, we seek permission to provisionally file under seal Defendants' letter motion to compel Plaintiff Jane Street to produce documents ("Letter Motion to Compel"), and the exhibits to the Declaration of Alexandra P. Sadinsky in support of the Letter Motion to Compel ("Exhibits").

The Letter Motion to Compel and Exhibits discuss areas of discovery related to Jane Street's business. Exhibits 2, 3, 7, 9, 10, 11, and 12 consist of documents that Jane Street produced in this action and designated as Highly Confidential – Attorney's Eyes Only. Exhibits 1, 4, 5, 6, and 8 consist of correspondence between the parties discussing Jane Street's productions, privilege assertions, and discovery obligations. Certain of these exhibits also include discussion of documents that Jane Street produced and designated as Highly Confidential – Attorney's Eyes Only. Exhibit 13 consists of formal discovery requests and responses and objections thereto relating to the documents that are the subject of this Letter Motion to Compel.

The Letter Motion to Compel cites to, paraphrases, or quotes from each of the Exhibits. Because Defendants believe that Jane Street will seek to seal portions of the Letter Motion to Compel and some or all of the Exhibits, Defendants request leave to provisionally file the Letter Motion to Compel and the Exhibits under seal. Defendants will meet and confer with Jane Street regarding sealing or redactions of the Letter Motion and Exhibits, and to the extent Jane Street consents, file public redacted versions on or before November 26, 2024. Defendants reserve the right to challenge any redactions proposed by Jane Street.

Respectfully submitted,

/s/ Alexandra P. Sadinsky

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